

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

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:
JOSEPH MICHAEL ARPAIO :
:
Plaintiff, : Case No. No. 1:18-cv-02387-APM
v. :
:
MICHELLE COTTLE, et al. :
:
Defendant. :
:
----- X

**CONSENT MOTION TO EXTEND TIME TO
FILE INITIAL RESPONSIVE PLEADING**

Defendants Michelle Cottle and The New York Times Company, incorrectly sued herein as “New York Times,” by and through counsel, hereby moves this Court to extend by 30 days the deadline to file an initial responsive pleading in this matter, and in support of which states as follows:

1. Defendants are still investigating the allegations in the Complaint and need additional time to formulate an appropriate response.
2. Providing Defendant with the requested relief will not prejudice either party.
3. Plaintiff consents to this motion.

WHEREFORE, for the reasons stated above, Defendants respectfully requests that this Court enter an Order:

- A. Extending Defendant’s deadline to file an answer or other initial, responsive pleading in this matter to January 10, 2018; and

B. Providing the parties any further relief deemed necessary and appropriate by this Court.

Dated: December 4, 2018

Respectfully submitted,

BALLARD SPAHR LLP

/s/ Jay Ward Brown

Jay Ward Brown (D.C. Bar No. 437686)
Chad R. Bowman (D.C. Bar No. 484150)
Dana R. Green (D.C. Bar No. 1005174)
1909 K. Street, NW, 12th Floor
Washington, D.C. 20006-1157
Telephone: (202) 661-2200
Facsimile: (202) 661-2299
brownjay@ballardspahr.com
bowmanchad@ballardspahr.com
greendana@ballardspahr.com

Attorneys for Defendants

CERTIFICATE OF SERVICE

I hereby certify that on this 4th day of December, 2018, a true and correct copy of the foregoing **CONSENT MOTION TO EXTEND TIME TO FILE INITIAL RESPONSIVE PLEADING** was filed with the Court through the electronic filing system, which will automatically serve electronic notice of the same on all counsel of record.

/s/ Jay Ward Brown
Jay Ward Brown

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ORDER

UPON CONSIDERATION OF Defendants Michelle Cottle and The New York Times Company's Consent Motion to Extend Time to File Initial Responsive Pleading, and good cause being shown for the relief requested therein, it is this _____ day of _____, 2018, by the United States District Court for the District of Columbia, hereby

ORDERED, that the motion be and is hereby GRANTED; and

ORDERED, that Defendants Michelle Cottle and The New York Times Company shall file their Answer or initial responsive pleading in this matter on or before January 10, 2018.

Judge, U.S. District Court for the District of Columbia

Copies to:

Jay Ward Brown (D.C. Bar No. 437686)
Chad R. Bowman (D.C. Bar No. 484150)
Dana R. Green (D.C. Bar No. 1005174)
BALLARD SPAHR LLP
1909 K. Street, NW, 12th Floor
Washington, D.C. 20006-1157

Larry E. Klayman
FREEDOM WATCH, INC.
2020 Pennsylvania Avenue, NW
Suite 345
Washington, DC 20006